

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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UNITED STATES OF AMERICA,

Plaintiff,

v.

Civil Action No. 02-4092

\$105,915.00 in United States  
Currency,

Defendants,

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ANSWER TO COMPLAINT FOR FORFEITURE

Defendant, Kum Ja Carpenter, by and through her attorneys, Paul H. Masciantonio and Peter K. Lee, and in answer to Plaintiff's Complaint for Forfeiture, states as follows:

1. Defendant admits the allegations contained in paragraph 1.
2. Defendant neither admits nor denies the allegations in paragraph 2, however, Defendant demands strict proof thereof.
3. Defendant admits the allegations of paragraph 3.
4. Defendant admits the allegations of paragraph 4.
5. Defendant neither admits nor denies the allegation in paragraph 5 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof. Further, said allegations are not applicable to Defendant.
6. Defendant neither admits nor denies the allegation in paragraph 6 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof. Further, said allegations are not applicable to Defendant.
7. Defendant neither admits nor denies the allegation in paragraph 7 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant

demands strict proof thereof. Further, said allegations are not applicable to Defendant.

8. Defendant neither admits nor denies the allegation in paragraph 8 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof. Further, said allegations are not applicable to Defendant.

9. Defendant neither admits nor denies the allegation in paragraph 9 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof. Further, said allegations are not applicable to Defendant.

10. Defendant neither admits nor denies the allegation in paragraph 10 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof. Further, said allegations are not applicable to Defendant.

11. Defendant neither admits nor denies the allegation in paragraph 11 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof. Further, said allegations are not applicable to Defendant.

12. Defendant neither admits nor denies the allegation in paragraph 12 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof. Further, said allegations are not applicable to Defendant.

13. Defendant neither admits nor denies the allegation in paragraph 13 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof. Further, said allegations are not applicable to Defendant.

14. Defendant neither admits nor denies the allegation in paragraph 14 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof. Further, said allegations are not applicable to Defendant.

15. Defendant neither admits nor denies the allegation in paragraph 15 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof. Further, said allegations are not applicable to Defendant.

16. Defendant neither admits nor denies the allegation in paragraph 16 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant

demands strict proof thereof. Further, said allegations are not applicable to Defendant.

17. Defendant neither admits nor denies the allegation in paragraph 17 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof. Further, said allegations are not applicable to Defendant.

18. Defendant neither admits nor denies the allegation in paragraph 18 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof. Further, said allegations are not applicable to Defendant.

19. Defendant neither admits nor denies the allegation in paragraph 19 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof. Further, said allegations are not applicable to Defendant.

20. Defendant neither admits nor denies the allegation in paragraph 20 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof. Further, said allegations are not applicable to Defendant.

21. Defendant neither admits nor denies the allegation in paragraph 21 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof. Further, said allegations are not applicable to Defendant.

22. Defendant neither admits nor denies the allegation in paragraph 22 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof. Further, said allegations are not applicable to Defendant.

23. Defendant neither admits nor denies the allegation in paragraph 23 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof. Further, said allegations are not applicable to Defendant.

24. Defendant neither admits nor denies the allegation in paragraph 24 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof. Further, said allegations are not applicable to Defendant.

25. Defendant neither admits nor denies the allegation in paragraph 25 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant

demands strict proof thereof. Further, said allegations are not applicable to Defendant.

26. Defendant neither admits nor denies the allegation in paragraph 26 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof. Further, said allegations are not applicable to Defendant.

27. Defendant neither admits nor denies the allegation in paragraph 27 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof. Further, said allegations are not applicable to Defendant.

28. Defendant admits the allegations in paragraph 28.

29. Defendant admits the allegations in paragraph 29.

30. Defendant admits the allegations in paragraph 30.

31. Defendant admits the allegations in paragraph 31.

32. Defendant admits the allegations in paragraph 32.

33. Defendant admits the allegations in paragraph 33.

34. Defendant admits the allegations in paragraph 34.

35. Defendant admits the allegations in paragraph 35.

36. Defendant admits the allegations in paragraph 36.

37. Defendant admits the allegations in paragraph 37.

38. Defendant admits the allegations in paragraph 38.

39. Defendant neither admits nor denies the allegation in paragraph 39 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof. Further, said allegations are not applicable to Defendant.

40. Defendant admits the allegations in paragraph 40.

41. Defendant admits the allegations in paragraph 41.

42. Defendant admits the allegations in paragraph 42.

43. Defendant admits the allegations in paragraph 43.

44. Defendant admits the allegations in paragraph 44.

45. Defendant neither admits nor denies the allegation in paragraph 45 as

Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof. Further, said allegations are not applicable to Defendant.

46. Defendant neither admits nor denies the allegation in paragraph 46 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof.

47. Defendant neither admits nor denies the allegation in paragraph 47 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant demands strict proof thereof.

48. Defendant admits the allegations in paragraph 48.

49. Defendant admits the allegations in paragraph 49.

50. Defendant admits the allegations in paragraph 50.

51. Defendant admits the allegations in paragraph 51.

52. Defendant admits the allegations in paragraph 52.

53. Defendant admits the allegations in paragraph 53

54. Defendant admits the allegations in paragraph 54.

55. Defendant admits the allegations in paragraph 55.

56. Defendant admits the allegations in paragraph 56.

57. Defendant admits the allegations in paragraph 57.

58. Defendant admits the allegations in paragraph 58

59. Defendant admits the allegations in paragraph 59 regarding the existence of daily and the house fee, however, Defendant denies that the additional fee amounts were for prostitution services.

60. Defendant denies the allegations in paragraph 60

61. Defendant admits the allegations in paragraph 61.

62. Defendant admits the allegations in paragraph 62

63. Defendant neither admits nor denies the allegation in paragraph 63 as Defendant lacks sufficient knowledge to formulate an answer, however, Defendant states that said statute speaks for itself.

- 64. Defendant denies the allegations in paragraph 64
- 65. Defendant denies the allegations in paragraph 65.
- 66. Defendant denies the allegations in paragraph 66
- 67. Defendant denies the allegations in paragraph 67
- 68. Defendant denies the allegations in paragraph 68.
- 69. Defendant denies the allegations in paragraph 69

WHEREFORE, Defendant Carpenter respectfully requests that the Plaintiff's Complaint be dismissed and for other orders as the Court may deem just and equitable.

Respectfully submitted,

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Date: September 9, 2002

Paul H. Masciantonio, Esq.  
1806 Callowhill St.  
Philadelphia, PA 19130

Peter K. Lee, Esq.  
5757 N. Lincoln Ave.  
Suite 20  
Chicago, IL 60659

VERIFICATION

Kum Ja Carpenter, under oath and duly sworn to, hereby declares under penalty of perjury as provided by 28 U.S.C. 1746, that she has reviewed the attached Answer to Complaint and that she has personal knowledge of same and that said Answers are true and correct

to the best of her knowledge and information and belief.

Date: September 9, 2002.

\_\_\_\_\_  
Kum Ja Carpenter

SUBSCRIBED and sworn to before me

this \_\_\_\_th day of September, 2002.

\_\_\_\_\_  
Notary Public